



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

1200 Sixth Avenue, Suite 900  
Seattle, WA 98101-3140

OFFICE OF  
ENVIRONMENTAL CLEANUP

September 27, 2012

Mr. Bob Wyatt  
NW Natural  
220 NW 2nd Avenue  
Portland OR 97209

*sent via email only*

Mr. Tom McCue  
Siltronic Corporation  
7200 NW Front Avenue, M/S 20  
Portland, Oregon 97210-3676

RE: EPA Comments on *Draft Engineering Evaluation/Cost Estimate, Gasco Sediments Cleanup Site* (dated May 2012)

Dear Sirs:

EPA has reviewed the *Draft Engineering Evaluation/Cost Estimate, Gasco Sediments Cleanup Site* (EE/CA), dated May 2012, and prepared by Anchor QEA, LLC on behalf of NW Natural. The Gasco EE/CA relied heavily on the Portland Harbor draft Feasibility Study (FS) for information, evaluation methodologies, and processes. It should be noted that EPA is currently reviewing the Portland Harbor draft FS and preparing comments to submit to the Lower Willamette Group (LWG). Due to the Gasco EE/CA's reliance on the Portland Harbor FS process, many issues identified within the Gasco EE/CA have also been identified through review of the Portland Harbor draft FS.

Placeholder comments were developed for the Gasco EE/CA for topics that appeared to be harbor-wide issues requiring further evaluation and guidance by EPA. The placeholder comments generally focused on four main topics. These topics are:

- Fate and Transport Modeling and Monitored Natural Recovery (MNR)
- Dredging Evaluation
- Benthic Risk Evaluation
- Identification of Oregon Hot Spots and Principal Threat Material

The placeholder comments are not being provided to NW Natural at this time. The harbor-wide issues identified in these comments are being considered through the Portland Harbor FS review process. Once further guidance and direction can be provided to NW Natural, information about the placeholder comments will be provided for your use to finalize the Gasco EE/CA.

A second set of comments were generated for issues specific to the Gasco Sediments Cleanup Site. This "Gasco-specific" set of comments is attached for review and is being provided to

expedite the EE/CA process while the harbor-wide issues are being resolved. The Gasco-specific EE/CA comments are categorized and sorted by topics in order to co-locate similar issues. The topics are shown in the "Comment Subject" column of the attached comment set.

Comments on the Gasco EE/CA were also received from several other stakeholders including Stratus on behalf of the Tribes and the U.S. Army Corps of Engineers. Copies of these stakeholder's comments are attached separately for review. Select comments from these stakeholders were integrated into the EPA comment set as well as comments from the Oregon Department of Environmental Quality (DEQ) and Ridolfi on behalf of the Yakama.

It should be noted that any comments provided on the Gasco EE/CA are preliminary as the Gasco EE/CA is so heavily dependent on the Portland Harbor draft FS. For example, the Gasco EE/CA includes exact text from the FS (e.g., the Remedial Action Objective sections). Therefore, comments provided on the Portland Harbor draft FS may also need to be addressed in the Gasco EE/CA.

Please let me know if you have any questions or concerns at (206) 553-1220 or via email at [sheldrake.sean@epa.gov](mailto:sheldrake.sean@epa.gov).

Sincerely,

A handwritten signature in blue ink, appearing to be "SS", followed by a long horizontal line.

Sean Sheldrake, RPM

Enclosures

Cc:

Kristine Koch, EPA

Chip Humphrey, EPA

Mark Ader, EPA

Dana Bayuk, ODEQ

*via email only*